

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff

v.

ROWLAND MARCUS ANDRADE,

Defendant

CASE No. 3:20-cr-00249-RS-1

**DECLARATION OF ROWLAND
MARCUS ANDRADE IN SUPPORT
OF MOTION OF ADMINISTRATIVE
RELIEF TO EXTEND SURRENDER
DATE AND NINTH CIRCUIT
UPDATE**

Judge: Hon. Richard Seeborg

EXHIBIT - C

DECLARATION OF ROWLAND MARCUS ANDRADE

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**DECLARATION OF ROWLAND
MARCUS ANDRADE IN SUPPORT OF
ADMINISTRATIVE RELIEF TO
EXTEND SELF-SURRENDER DATE**

Judge: Hon. Richard Seeborg

DECLARATION OF ROWLAND MARCUS ANDRADE IN SUPPORT OF
ADMINISTRATIVE RELIEF TO EXTEND SELF-SURRENDER DATE MOTION

This declaration incorporates by reference all the facts set forth in the previous declaration
as set forth in docket number 788-2. I Rowland Marcus Andrade declare as follows:

1. The left ankle surgery is a Dwyer osteotomy with anterior capsulotomy and
osteophyte excision to correct a high-arched (cavovarus) foot deformity and address
associated structural problems.
2. On October 8, my A1C level was above the threshold at 8.7. When I was retested on

1 November 6, 2023, I had reduced my A1C to 7.5. I was informed that I needed to
2 reduce my A1C level to below 7, which was hard, but I was able to accomplish it just
3 before Thanksgiving. I got to a 6.9. I was also notified that I may have Angina
4 Pectoris, which I learned is related to my heart not receiving enough oxygen. The
5 doctors confirmed this through “Chart Review.” The VA referred me to a specialist in
6 Houston, Texas, where I underwent a 2D echocardiogram — essentially a sonogram
7 of the heart. I have not yet received the test results which is needed in order to find out
8 what the underlying issue is.

10 3. On December 10, I met with my surgeon and was informed that my surgery date is set
11 for January 26, 2026. The doctors can still proceed with the surgery despite the
12 Angina Pectoris issue, but they will need to take certain precautions, such as
13 potentially using a nerve block. I have an appointment on December 30, 2025 to
14 review the precautions in detail. I was also informed that I will be in a cast for six
15 weeks following the surgery.

17 4. I made vigorous efforts to schedule my left-ankle surgery in November and December
18 but was unable to do so. The doctors allowed me to take multiple A1C tests within a
19 45-day period to bring my A1C level down, which was necessary to schedule my
20 surgery. While A1C tests are typically conducted every 90 to 120 days, the doctors
21 made an exception due to the urgency of my situation, ensuring that my blood sugar
22 levels were adequately controlled so I could move forward with scheduling my
23 surgery. I attempted to schedule my surgery for this month but was unable to, as the
24 orthopedic surgeons at the Veterans Administration (VA) only operate on Wednesdays
25

1 due to their commitments at other hospitals, and their schedule was fully booked until
2 January 26, 2026.

3 5. I will help my appellate counsel understand the case before my surrender date, given
4 the size of the matter, the nearly 800 docket entries, and the substantial amount of
5 evidence in the record which includes data that was way too big to efile so it had to be
6 shipped to the Court. I can be able to assist the counsel since doing so is in my best
7 interest and that I need to get the counsel up to date quickly so that he can also file my
8 appeal on the denial of the motion for me to remain on bond and so that he can
9 properly understand all aspects of the case in order for counsel to be effective.
10

11 6. If I were to flee — which I will not — my family and I will lose our interest in all of
12 our assets. Such an action would have devastating consequences for my family and I.
13 Not only financially, but my two young daughters, ages 6 and 10, would endure
14 significant emotional strain and would be further traumatized by this. I am deeply
15 committed to my family and would never take any action that would endanger their
16 mental state or their well-being.
17

18 7. I hold an ownership interest in my home, jointly with my wife, as well as joint-stock
19 in biometric-based and digital wallet-based, patent-protected intellectual property that
20 I developed in 2015. These assets have a potential joint value in the tens of millions, if
21 not hundreds of millions, of dollars. A portion of these assets is individually sufficient
22 to satisfy the full amount of the forfeiture judgment. The government is aware of this,
23 and the attached damages report, prepared by an experienced industry expert who
24 regularly testifies in patent litigation, confirms that one company alone owes the
25
26

1 patent company between \$2.7 million (on the low end) and \$40.8 million (on the high
2 end) per year. And this is just one company. See Attachment 1 to this declaration.
3 Aside from their international money laundering activities conducted behind my back,
4 these patents were exactly what Abramoff and his associates were after. The
5 government is aware of this, as well as the value of the technology, as evidenced in the
6 record (NDCA Case No. 20-cr-000249 at Dkt. 777, p. 8:1-3, p. 9, footnote 1, and p.
7 10:14-18; 9th Cir. No. 25-5095 at Dkt. 27-2, p. 14 of 37).

8
9 8. I have fully complied with all conditions of my bond and release, have appeared at
10 every hearing, and have remained in regular communication with Probation and
11 counsel. I pose no flight risk or danger to the community. If the Court deems it
12 appropriate, I consent to release conditions, including home detention or GPS
13 monitoring, during any period of extension.
14

15 9. My wife is currently studying for an exam that will allow her to obtain employment in
16 February or early March of 2026 so she can help provide financial support for herself
17 and our daughters. Although my surgeries will prevent me from walking, I will still be
18 able to assist by caring for the children while she continues studying and begins
19 working until my surrender date.
20

21 I declare under penalty of perjury under the laws of the United States that the foregoing is
22 true and correct. Executed on December 16, 2025.

23
24
25 /s/ Marcus Andrade
26 /s/ Rowland Marcus Andrade

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28 DEFENDANT MARCUS ANDRADE'S MOTION FOR
ADMINISTRATIVE RELIEF TO EXTEND SURRENDER
DATE AND 9TH CIRCUIT UPDATE.

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EXHIBIT - 1

PATENT RELATED ASSETS

(In Support of Declaration of Marcus Andrade, ¶ 7)

Preliminary Assessment: [REDACTED]

Preliminary Estimate [REDACTED]

For the Period March 20, 2023 through December 31, 2027 ¹

	Estimated U.S. Blockchain Revenues ²	% Utilizing Patented Features ³	Total Potentially Accused Revenues ⁴	1% Royalty	5% Royalty	10% Royalty
(in millions)						
Low Scenario	\$ 544.4	50%	\$ 272.2	\$ 2.7	\$ 13.6	\$ 27.2
High Scenario	\$ 544.4	75%	\$ 408.3	\$ 4.1	\$ 20.4	\$ 40.8

Sources/Notes:

¹ [REDACTED]

² See Schedule 2.0.

[REDACTED]

[REDACTED]

Preliminary Assessment:

<i>(in millions)</i>	Total U.S. Blockchain Market ²	Multiply : \$	Estimated U.S. Blockchain Revenues
<i>Pre-Complaint</i>			
Mar. 20 – Dec. 2023	\$ 3,743.9	0.55%	\$ 20.6
2024	8,041.7	0.55%	44.2
Jan. – Jun. 30, 2025	7,005.4	0.55%	38.5
Subtotal	\$ 18,791.0		\$ 103.4
<i>Post-Complaint to Trial</i>			
Jul. – Dec. 2025	\$ 7,121.5	0.55%	\$ 39.2
2026	25,773.7	0.55%	141.8
2027	47,293.4	0.55%	260.1
Subtotal	\$ 80,188.7		\$ 441.0
Grand Total	\$ 98,979.7		\$ 544.4

Sources/Notes:

¹ [REDACTED]

² See Schedule 3.0.

[REDACTED]

Summary of U.S. Blockchain Market, by Application Type ¹

(in millions)	Payments	Exchanges	Smart Contracts	Documentation	Digital Identity	Governance, Risk, & Compliance		Other	Total U.S. Blockchain Market
[REDACTED]	\$ 2,283	\$ 473	\$ 420	\$ 639	\$ 236	\$ 444	\$ 267	\$ 4,761	
[REDACTED]	3,912	797	701	1,091	389	738	414	8,042	
[REDACTED]	6,973	1,394	1,218	1,938	666	1,275	663	14,127	
[REDACTED]	12,903	2,534	2,197	3,574	1,184	2,286	1,094	25,774	
[REDACTED]	24,009	4,633	3,986	6,630	2,118	4,123	1,795	47,293	
[REDACTED]	45,040	8,541	7,289	12,400	3,815	7,496	2,926	87,507	

Sources/Notes:

[REDACTED]

[REDACTED]

[REDACTED]